

February 6, 2013  
Via US ECFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

RE: IBFA Acquisition Company, LLC  
Form 499 Filer ID: 825416  
Annual Customer Proprietary Network Information Compliance Certification;  
EB Docket No. 06-36

Dear Ms. Dortch,

Enclosed for filing is the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification; EB Docket No. 06-36, filed on behalf of IBFA Acquisition Company, LLC.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Please do not hesitate to contact me at 407-260-1011 or [mark@csilongwood.com](mailto:mark@csilongwood.com) if you have any questions or concerns.

Thank you for your assistance in processing this filing.

Sincerely,



Mark G. Lammert, CPA  
Tax Preparer for IBFA Acquisition Company, LLC

cc: IBFA Acquisition Company, LLC  
file: IBFA Acquisition Company, LLC- PUC - FCC

**STATEMENT OF POLICY IN TREATMENT OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION**

1. It is IBFA Acquisition Company, LLC (hereafter referred to as "IBFA Acquisition Company") policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer's consent prior to using CPNI.
2. IBFA Acquisition Company follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or IBFA Acquisition Company. However, IBFA Acquisition Company cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
  - A. If an unauthorized disclosure were to occur, IBFA Acquisition Company shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").
  - B. IBFA Acquisition Company shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
  - C. Notwithstanding the provisions in subparagraph B above, IBFA Acquisition Company shall not wait the additional seven (7) days to notify its customers if IBFA Acquisition Company determines there is an immediate risk of irreparable harm to the customers.
  - D. IBFA Acquisition Company shall maintain records of discovered breaches for a period of at least two (2) years.
3. All employees will be trained as to when they are, and are not, authorized to use CPNI upon employment with the Company and annually thereafter.
  - A. Specifically, IBFA Acquisition Company shall prohibit its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:
    1. When the customer has pre-established a password.
    2. When the information requested by the customer is to be sent to the customer's address of record, or

ANNUAL 47 C.F.R. S: 64.2010 (e) CPNI CERTIFICATION FOR 2013  
EB Docket 06-36

Date Filed: January 28, 2013  
Name of Company: IBFA Acquisition Company, LLC  
Form 499 Filer ID: 825416  
Name of Signatory: Baldwin Yung  
Title of Signatory: President

I, <sup>8002</sup>~~Baldwin~~ Yung, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. &64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: \_\_\_\_\_

